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**UNITED STATES DISTRICT COURT**

**CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

JANET GARCIA, et al.,

Plaintiffs,

v.

CITY OF LOS ANGELES, a  
municipal entity,

Defendants.

CASE NO. 2:19-cv-06182-DSF-PLA

**DECLARATION OF JED  
PARRIOTT**

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**DECLARATION OF JED PARRIOTT**

1  
2  
3 1. My name is Jed Parriott. I have personal knowledge of the  
4 facts contained in this declaration, and if called to testify, I could and would testify  
5 competently as to the truth of the facts in this declaration.

6 2. I am a member of AREPS, which was an active party in this  
7 litigation until June 2020. I am also a founding member and very active member of  
8 Streetwatch, which is a project of the Democratic Socialists of America-Los Angeles  
9 Chapter.

10 3. One of the main goals of Streetwatch is to monitor cleanups of  
11 homeless encampments and enforcement actions that are conducted by LA Sanitation,  
12 Los Angeles Department of Recreation and Parks, the Los Angeles Police  
13 Department, and other city agencies. We monitor the cleanups as frequently as  
14 possible, but it is often difficult to find out when a cleanup will be taking place  
15 because the City of Los Angeles does not post the notices publicly. Also, I have been  
16 gone to monitor many cleanups when notices were posted, and the cleanups did not  
17 take place as indicated on the signs.

18 4. Not knowing whether a cleanup is going to happen is a common  
19 problem we face, trying to monitor cleanups. This has been a problem for as long as I  
20 have been monitoring cleanups.

21 5. In 2018 and 2019, I was part of a group that worked with the  
22 Mayor's office for six months to discuss making changes to cleanups to better address  
23 public health concerns and decrease the harm to unhoused residents. We repeatedly  
24 brought up the fact that there was no good way to find out when cleanups were  
25 happening. Members of the mayor's staff told us they were working on developing a  
26 mobile application to let people know the status of cleanups, and they were going to  
27 post the information online. I have never been able to find any of this information  
28 online or via any kind of app. The paper notices that are posted around encampments  
are the main way that people know cleanups are happening.

1           6. For about the past year, I have also been relying on the notices that  
2 Adrian Riskin has managed to get from Sanitation most days. He emails out the  
3 notices every day, so we can have a better idea when the cleanups are happening.  
4 These notices are sometimes inaccurate, and I have been to many locations where  
5 CARE+ cleanups were supposed to be happening, only to find out that nothing is  
6 happening that day.

7           7. For the past two years, I have routinely monitored the weekly  
8 cleanups of the Special Enforcement and Cleaning Zone around the A Bridge Home  
9 shelters throughout Los Angeles, in addition to monitoring CARE+ cleanups. I was  
10 there the first day the City launched the Special Enforcement and Cleanup Zone at the  
11 A Bridge Home shelter on Schrader Blvd., and I have been there for many weekly  
12 CARE+ comprehensive cleanups and daily CARE enforcement actions.

13           8. Before COVID-19, people would be required to move all of their  
14 belongings out of the SECZ or at least out of the way of LA Sanitation crews every  
15 Wednesday. Since the City of Los Angeles has been under a state of emergency and  
16 until this week, LA Sanitation has not been making people take their tents down move  
17 out of the SECZ during the cleanups.

18           9. On July 29, 2020, I was aware that the Los Angeles City Council  
19 was going to vote on a motion to resume the comprehensive cleanups around the ABH  
20 shelters, and if the motion was successful, they could start making people move out of  
21 the area again.

22           10. I watched the Los Angeles City Council meeting via the online  
23 portal, and I gave public comment against the motion. I heard the statements of city  
24 council members regarding their reasons for restarting cleanups. I was confused by  
25 Mr. Buscaino's statements about wanting to start the CARE+ cleanups to be able to  
26 throw away bulky items, because at the time, I was a member of an organizational  
27 plaintiff in this case, and I knew that this Court issued an order preventing the City  
28 from enforcing the Bulky Item Provision of LAMC 56.11.



1           11. After the City Council voted to start the comprehensive cleanups  
2 again, I heard that the mayor said at a press conference that he wasn't sure if they  
3 were going to resume cleanups. Therefore, I had no idea when the CARE+ cleanups  
4 were going to start again. But I had no way of finding out what the status of the  
5 cleanups were.

6           12. I knew that Mr. Buscaino had mentioned the A Bridge Home  
7 shelter in San Pedro during the city council meeting, and Streetwatch and other  
8 community groups were preparing to have monitors present for the first cleanups. I  
9 had seen the signs around the shelter, and I saw that the SECZ was scheduled to begin  
10 operating until August 7, 2020. In my experience monitoring the start of SECZs  
11 around shelters, the City is not supposed to do comprehensive cleanups until 30 days  
12 after the A Bridge Home shelter opens, so I assumed that they would not do cleanups  
13 until at least August 7, 2020. I also knew, based on the permanent signs posted  
14 around the shelter, that the cleanups were scheduled to take place every week on  
15 Tuesdays. Streetwatch was organizing people to monitor the first CARE+ cleanup on  
16 August 10, 2020.

17           13. On Saturday, August 1, 2020, a friend of mine forwarded me the  
18 news article from the Daily Breeze about the CARE+ cleanup. The news article is  
19 available at [dailybreeze.com/2020/07/31/la-resumed-its-comprehensive-encampment-](https://www.dailybreeze.com/2020/07/31/la-resumed-its-comprehensive-encampment-cleanups-friday-july-31-in-san-pedro/)  
20 [cleanups-friday-july-31-in-san-pedro/](https://www.dailybreeze.com/2020/07/31/la-resumed-its-comprehensive-encampment-cleanups-friday-july-31-in-san-pedro/). The article and screenshots of relevant photo  
21 slides that accompanied the article are attached as Exhibit A. That's when I learned  
22 that the City had done a CARE+ cleanup on July 31, 2020. If I had known that the  
23 cleanup was going to take place that day, I would have attended the cleanup to  
24 monitor the cleanup, but under the circumstances, I did not know it was taking place  
25 that day.

26           14. At this point, we had no idea if the cleanups were going to start  
27 again. From the Daily Breeze article, that the City had posted paper notices at the  
28 ABH shelter at Beacon, and I assumed they would do so at the other ABH sites, since

1 they had not been doing cleanups for five months (even though the metal signs had  
2 remained up the whole time).

3 15. On August 4, 2020, I checked in with unhoused residents who live  
4 near the shelter, and they said that there were no notices posted for a cleanup on  
5 August 5. I went to the SECZ on the morning of August 5, 2020. The City did not  
6 comprehensive cleanup that day.

7 16. On August 10, I learned from a resident who lives in the SECZ that  
8 LA Sanitation workers had told them orally that a comprehensive cleanup would  
9 happen on Wednesday, but they didn't know whether to trust them, because it's  
10 sometimes like a game of telephone, and some workers will say one thing, and other  
11 workers will say something else. Therefore, I had no idea if the cleanup was going to  
12 happen on August 12, 2020.

13 17. On August 12, 2020, the CARE+ Confirmation sheet said that they  
14 were only going to do Spot Cleaning at the ABH site at Schrader. This is not  
15 accurate. I have been to many "spot cleanings" and many comprehensive cleanups,  
16 and one of the main differences is that during Spot Cleanings, people do not have to  
17 take their tents down or leave the area. For comprehensive cleanups, they do. On  
18 August 12, 2020, they did a full CARE+ comprehensive cleanup.

19 18. I went to the cleanup anyway on August 12, 2020. I walked  
20 around, and I didn't see any "notice of major cleanup" signs posted. The only signs I  
21 saw that morning were the permanent metal signs that have a map of the SECZ on  
22 them. These signs had been up during the whole pandemic.

23 19. LA Sanitation and the LAPD did in fact show up to do a  
24 comprehensive cleanup. People who were in the area were allowed to move their  
25 belongings out of the area, but people did not know about the cleanup and did not  
26 move their belongings. I saw a number of people's belongings thrown away.

27 20. I monitored the cleanup for approximately five hours. After LA  
28 Sanitation finished and took down yellow tape that they had put up to keep people out  
of the cleanup area, I walked to where I knew some people had been staying. I saw a

1 Notice taped to a tree. I took a photograph of the notice, a true and correct copy of  
2 which is attached as Exhibit B.

3  
4 I declare under penalty of perjury that the foregoing is true and correct.

5 Executed on August 14, 2020 in Los Angeles, California

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JED PARRIOTT

**EXHIBIT A**

NEWS • News

## LA resumed its comprehensive encampment cleanups Friday, July 31, in San Pedro



A major cleaning of homeless encampments along Beacon Street close to where new shelters have been opened in San Pedro on Friday, July 31, 2020. The city is gave people notice two days before the cleanup, as well as offered showers, replacement tents and COVID-19 testing. (Photo by Brittany Murray, Press-Telegram/SCNG)

By **DONNA LITTLEJOHN** | [dlittlejohn@scng.com](mailto:dlittlejohn@scng.com) | Daily Breeze

PUBLISHED: July 31, 2020 at 3:38 p.m. | UPDATED: July 31, 2020 at 3:41 p.m.



Elisa Ayala looked at one of two clear, 60-gallon plastic bags she and her wife, Elicia Suarez, had been issued Friday morning, July 31. Then they looked at their tent and numerous belongings, including a dog house and their pet canine, Bear.

Moving day would not be easy.

"We're already looked down on," Suarez said of the experience. "This is what they're doing to get us into (prison) camps. It's just a little too much."

Ayala and Suarez were among dozens of homeless individuals in San Pedro having to pack up and move, if only down the street and for the day, to make way for what would be a massive street cleanup.

It was the first comprehensive encampment cleanup held in four months by the city of Los Angeles; the city suspended the cleanups in March because of the coronavirus pandemic. Los Angeles City Councilmember Joe Buscaino, who represents the area, persuaded his colleagues, who voted 10-4 this week, to reinstate the comprehensive deep cleanings.

Buscaino wasted no time in scheduling the city's first cleanup along San Pedro's Beacon Street homeless encampment, which is near a temporary homeless shelter Los Angeles County runs. The work continued all day in more than 80 degree heat.

The cleanings, which require the homeless to move their tents and belongings until the work is finished, include trash pickups and street and sidewalk power washings. Mobile showers were also brought in for those who wanted to use them.

Each person was given a clear plastic bag that holds 60 pounds for what they need to take with them. The rest either must be designated for a 90-day storage at the area's sanitation yard or hauled away as trash.

Buscaino, meanwhile, has asked the city to declare a "no-tent" zone around LA's new temporary shelters, which are part of the A Bridge Home initiative spurred by Mayor Eric Garcetti. The city has three shelters in Buscaino's 15th District, in San Pedro, Wilmington and Watts. The councilmember said problems have arisen at the shelters, with some who leave the facilities during the day revisiting their tents.

"We know that many tents are used as second residences for those who have moved into shelters," he said in a statement.

Buscaino has appealed to coronavirus regulations from the U.S. Centers for Disease Control and Prevention in arguing that there is no social distancing in the tent communities.



"The people in my encampments have an alternative which is to go into the (Bridge Home) shelter which is within CDC guidelines," he said. "Applying CDC guidelines to isolate a community that has compromised its own isolation is a misusing of the guidelines."

"While I respect the CDC guidelines, I would welcome an on-the-ground assessment from the county," Buscaino continued in his statement. "The pandemic is forcing us to live differently. All of us are adjusting in different ways and making new considerations for the way we do things. This is the biggest issue in my district, and I need to clean the streets that I'm responsible for."

The forays by shelter residents to former tent homes, which some homeless folks refer to as "boom-boom rooms," are used often for sex but can also provide privacy for drugs and other illegal behavior, said Buscaino spokesperson Branimir Kvartuc. Such behavior is strictly banned at the shelters.

About half of the 45 tents in the immediate vicinity, Kvartuc said, are being used as "second residences."

Among the conversations taking place now, Kvartuc said, is finding a way to provide some privacy for couples who are living in the shelters as a way to deter off-premises rendezvous.

Regular, more frequent cleanups promised to residents near the Bridge Home shelters will begin Aug. 7 in San Pedro. The deep cleanings require a 24-hour advance notice to be posted so encampment residents can prepare.

Alaya and Suarez, for their part, said past comprehensive cleanups have resulted in them losing personal papers and other necessary items. One cleanup, Suarez said, swept away their dog's bedding and food.

The couple, along with Bear, had been in the county's 40-bed temporary shelter just across the street for five months. But, they said, it didn't work out for them. Bear was in the news when he became the first dog taken into the shelter's kennel space after it first opened.

The promise of permanent housing and job training, Suarez said, didn't come through.

It would have been better, Suarez added, if the city had met with those who are homeless and provided them with the cleaning tools to do the work themselves.

The last-minute posting requiring everyone to pack up and move, she said, "is not cool."

Homeless folks, Ayala said, too often are viewed as "dirt."



But, she added, "We're humans, just like you."

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## Donna Littlejohn | reporter

Donna Littlejohn has covered the Harbor Area as a reporter since 1981. Along with development, politics, coyotes, battleships and crime, she writes features that have spotlighted an array of topics, from an alligator on the loose in a city park to the modern-day cowboys who own the trails on the Palos Verdes Peninsula. She loves border collies and Aussie dogs, cats, early California Craftsman architecture and most surviving old stuff. She imagines the 1970s redevelopment sweep that leveled so much of San Pedro's historic waterfront district as very sad.

[dlittlejohn@scng.com](mailto:dlittlejohn@scng.com)

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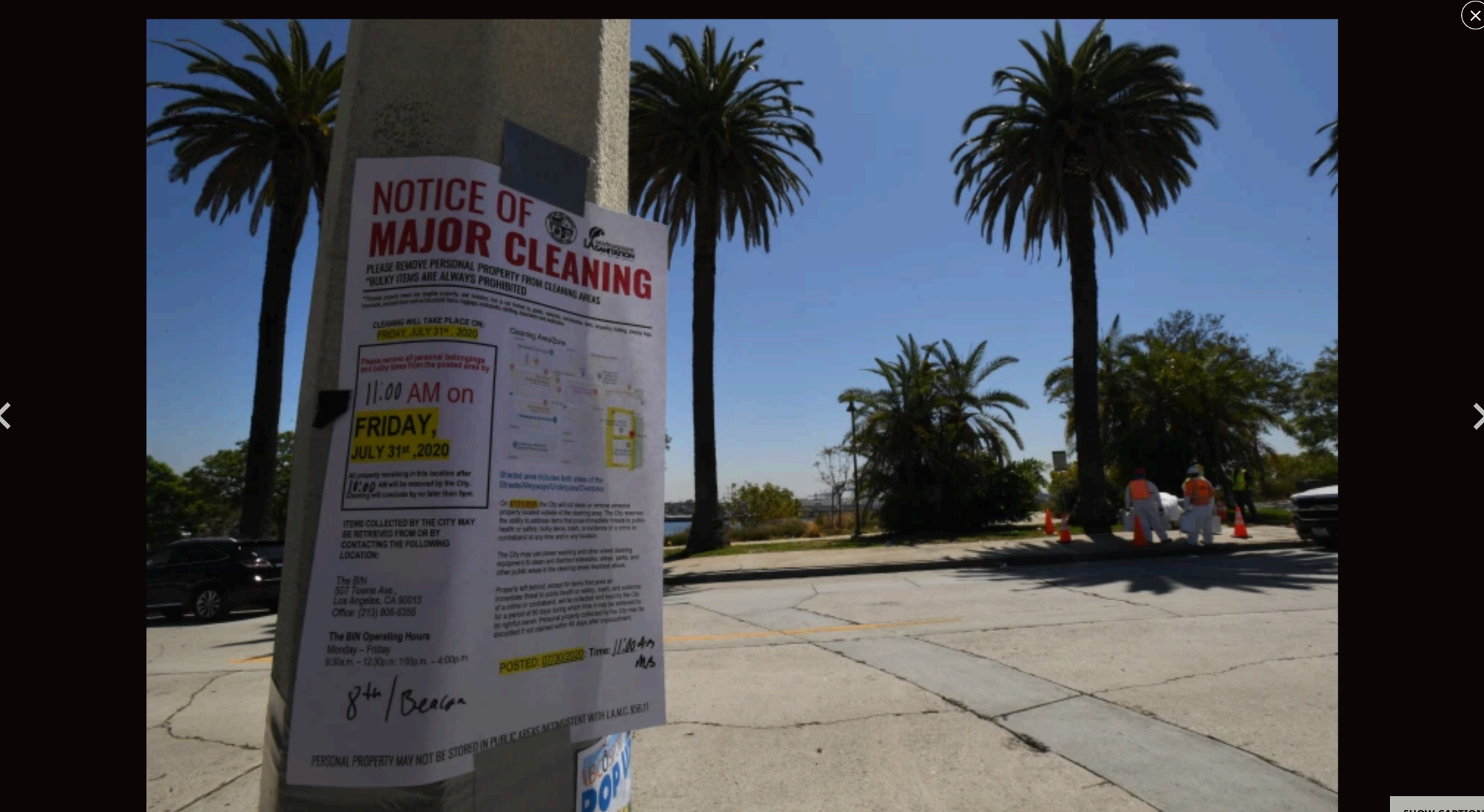
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# EXHIBIT B



Location 4  
6 Items



## NOTICE

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### PROHIBITED

Failure to remove this bulky item within 24 hours will subject it to removal by the City. Moving this bulky item to another public area is not removal. Absent an immediate threat to public health or safety, the bulky item and personal property removed from within the bulky item will be maintained in a secured location for 90 days. The rightful owner of a bulky item or personal property removed from this area may retrieve the items by contacting:

507 S. TOWNE AVE., LOS ANGELES, CA 90013

For Information, Please Call:

1-213-806-6355 / 1-844-475-1244

POSTING LOCATION 1464 Cherokee  
POSTING DATE 08-12-20 TIME 02:30 PM, SANCASE # 87405